

Exhibit C

Charles Cuprill

From: Susana Peñagaricano <spenagaricano@justicia.pr.gov>
Sent: Wednesday, May 13, 2020 10:36 AM
To: Charles Cuprill
Cc: Wandymar Burgos Vargas; Iván J. Ramírez Camacho
Subject: RE: Lift Stay Notice FW: Consejo de la Salud de la Comunidad la Playa de Ponce, Inc., now Med Centro Inc. v. Hon. Lorenzo Gonzalez as Secretary of the Department of Health of the Commonwealth of Puerto Rico (the "Commonwealth"), Case No. 06-1260 (GAG)

Esteemed counsel:

I hope this electronic mail finds you and your family well.

Reference is made to your lift stay notice dated April 15, 2020 (the "Lift Stay Notice"), regarding Consejo de Salud de Comunidad de Playa Ponce, Inc., now Med Centro, Inc.'s ("Med Centro"), "intent to seek relief from the Automatic Stay for the purpose of prosecuting in Case No. 06-1260 (GAG) [the "Case"] a request for the calculation of its PPS per visit rate, utilizing the applicable adjustable PPS per visit rate from 2009 forward pursuant to 42 U.S.C. §1396 (b) (b) (3) and CMS' 2001 guidance including the corresponding wraparound payments [...]."

Pursuant to the lift stay protocol established by the *Notice, Case Management and Administrative Procedures* in the Case Management Order [ECF No. 11885 in Case No. 17-3283], and after reviewing the Lift Stay Notice and related background, the Commonwealth of Puerto Rico has determined, in coordination with FOMB's and AAFAF's legal representatives, to deny your request for modification of the stay as detailed in your Lift Stay Notice. The remedies Med Centro seeks to prosecute in the Case are improper. In particular, following the execution of the "Confidential Settlement Agreement" (the "Settlement Agreement") on October 6, 2011, the Case was dismissed, with prejudice, and the District Court retained jurisdiction solely to enforce the Settlement Agreement only for a period of four (4) years. Such period expired in 2015. As a result, the District Court no longer has jurisdiction over the Case and there are no remedies to be prosecuted therein in the absence of the automatic stay.

Cordially,

s/SIPB

Susana I. Peñagaricano-Brown

Director

Federal Litigation and Bankruptcy Division

Puerto Rico Department of Justice

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